

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**ENTRY OF APPEARANCE AND REQUEST
FOR NOTICE AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rule 9010(b), the undersigned appears in the above-captioned case on behalf of CTO Carolina Pavilion, successor in interest for DDR Carolina Pavilion (“CTO Carolina Pavilion”), and pursuant to 11 U.S.C. §§ 102(1) and 342 and Bankruptcy Rules 2002 and 9007 request that they be placed on all mailing matrixes, and further request that all notices, given or required to be given, all pleadings, papers or other documentation served or required to be served herein be given to and served on the undersigned attorneys at the addresses set forth below:

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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petitions, pleading request, complaints, demands, disclosure statement, plan of reorganization and answering or reply briefs, whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this notice or any later appearance, pleading, claim, or suit shall constitute a waiver of CTO Carolina Pavilion's (1) right to have final orders in non-core matters entered only after *de novo* review by the United States District Court Judge; (2) right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to this case; (3) right to have the United States District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal; and (4) other rights, claims, actions, or defenses to which CTO Carolina Pavilion is or may be entitled under any agreements, in law, or in equity. All of the above rights are expressly reserved by CTO Carolina Pavilion without exception, and without conceding jurisdiction in any way by this filing or by any other participation in this bankruptcy case.

Dated: February 12, 2025

BURR & FORMAN LLP

/s/ J. Cory Falgowski
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